

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JOSE SANCHEZ

Case No. 3:18-MJ-451-BH

FILED UNDER SEAL

MOTION FOR DETENTION

The United States of America moves for the pretrial detention of Defendant **JOSE SANCHEZ** pursuant to 18 U.S.C. § 3142.

1. Eligibility of Case. This case is eligible for a detention order because it involves (A) a material witness in a criminal proceeding whose presence may become impracticable to secure by subpoena; and (B) (check all that apply):

_____ Crime of violence (18 U.S.C. §3156)

_____ Maximum sentence of life imprisonment or death

X 10 + year drug offense

_____ Felony, with two prior convictions in above categories

X Serious risk that defendant will flee

_____ Serious risk of obstruction of justice

_____ Felony involving a minor victim

_____ Felony involving a firearm, destructive device, or any other
dangerous weapon

_____ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

 X Defendant's appearance as required

 X Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check all that apply):

 X Probable cause to believe defendant committed 10+ year drug offense or firearms offense,

_____ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

_____ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

_____ Previous conviction for "eligible" offense committed while on pretrial bond

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing,

_____ At first appearance

 X After continuance of 3 days (not more than 3).

DATED this 6th day of July 2018.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

/s/ Rebekah Ricketts

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on the 6th day of July 2018.

/s/ Rebekah Ricketts

Rebekah Ricketts

Assistant United States Attorney